

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of )
Modernizing the E-Rate Program for ) WC Docket No. 13-184
Schools and Libraries )
)

ORDER

Adopted: December 14, 2022

Released: December 14, 2022

By the Chief, Wireline Competition Bureau:

I. INTRODUCTION

1. In this Order, the Wireline Competition Bureau (Bureau) adopts the final eligible services list for funding year 2023 for the schools and libraries universal service support program (more commonly referred to as the E-Rate program).1 Specifically, based on the record before us, we adopt the eligible services list for funding year 2023 as proposed in the Bureau’s Public Notice.2 In addition, we release the eligible services list for funding year 2023 and authorize the Universal Service Administrative Company (USAC) to open the annual FCC Form 471 application filing window within 60 days after the release date of this Order.3

2. In doing so, we find good cause to waive the requirement in section 54.502(e) of the Commission’s rules that the final eligible services list be released at least 60 days prior to the opening of the application filing window to ensure that the application filing window is opened with enough time for applicants to submit and USAC to process funding year 2023 FCC Form 471 applications.4

II. FUNDING YEAR 2023 ELIGIBLE SERVICES LIST

A. Background

3. Sections 254(c)(1), (c)(3), (h)(1)(B), and (h)(2) of the Communications Act of 1934, as amended, collectively grant the Commission authority to specify the services that will be supported for eligible schools and libraries and to design the specific mechanisms for support.5 Pursuant to this

1 The Bureau annually updates the eligible services list, which specifies the services and products that are eligible for E-Rate funding each funding year. See 47 CFR § 54.502(a) (“All supported services are listed in the Eligible Services List as updated annually in accordance with paragraph (d) of this section.”); see also 47 CFR § 54.502(e) (detailing the procedures for seeking comment on the draft eligible services list).

2 Wireline Competition Bureau Seeks Comment on Proposed Eligible Services List for the E-Rate Program, WC Docket No. 13-184, Public Notice, DA 22-878, 1 (WCB 2022) (Funding Year 2023 Eligible Services List Public Notice).

3 See Schools and Libraries Universal Service Support Mechanism, Eligible Services List for Funding Year 2023 (FY 2023 Eligible Services List), infra Appendix B; 47 CFR § 54.502(e) (requiring the final eligible services list to be released at least 60 days prior to the opening of the application filing window).

4 47 CFR § 54.502(e).

5 47 U.S.C. §§ 254(c)(1), (c)(3), (h)(1)(B), (h)(2).

authority, the Commission delegated responsibility to the Bureau to annually seek public comment on the proposed eligible services list.<sup>6</sup>

4. In the *Funding Year 2023 Eligible Services List Public Notice*, we did not recommend any specific changes to the eligible services list, and sought comment on that proposal.<sup>7</sup> The comment cycle for the *Funding Year 2023 Eligible Services List Public Notice* closed on October 6, 2022.<sup>8</sup> During the comment cycle, we received two requests for clarification of the scope of certain items in the proposed eligible services list. First, Verizon requests clarification regarding the Category One list, to make clear to applicants that fixed wireless services are eligible for Category One support.<sup>9</sup> Second, Extreme Networks seeks clarification to make clear to applicants that certain Artificial Intelligence for information technology (IT) operations software applications are eligible for E-Rate support.<sup>10</sup> We also received comments and reply comments asking the Commission to clarify the eligibility of advanced or next-generation firewalls and other network security services,<sup>11</sup> and for the provision of Wi-Fi services on school buses.<sup>12</sup> We address all of these requests further below.

## B. Discussion

5. As an initial matter, we waive the requirement in section 54.502(e) of the Commission's rules that the eligible services list be released at least 60 days prior to the opening of the application filing window for the upcoming funding year.<sup>13</sup> Section 1.3 of the Commission's rules allows the Commission to waive a rule on its own motion for good cause shown.<sup>14</sup> To ensure that the FCC Form 471 application filing window opens with enough time to allow applicants to submit and USAC to process applications for funding year 2023, we find a waiver of our rule is appropriate and in the public interest.<sup>15</sup> In waiving our rule, we are particularly cognizant of the need to ensure both applicants and USAC have as much time as they had last year to submit and process applications. We therefore find special circumstances to waive section 54.502(e).<sup>16</sup>

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<sup>6</sup> See 47 CFR § 54.502(e).

<sup>7</sup> *Funding Year 2023 Eligible Services List Public Notice* at 1.

<sup>8</sup> *Id.* at 1. The Bureau received nine comments and eight reply comments in response to the *Funding Year 2023 Eligible Services List Public Notice*. Appendix A contains a list of the commenters and the acronyms, if any, used herein to refer to these commenters.

<sup>9</sup> Verizon Comments at 1-2.

<sup>10</sup> Extreme Networks Comments at 1-2.

<sup>11</sup> See, e.g., ADS Reply at 1-3; ALA Comments at 1-2; Aruba Reply at 1-2; CGCS Comments at 1-3; CoSN Reply at 2-3; Crown Castle Fiber Reply at 1-5; ENA Services Reply at 3; Fortinet Comments at 5-10; SETDA Reply at 1-2; Val Verde Unified School District Comments at 1-2.

<sup>12</sup> See, e.g., E-Rate Provider Services Comments at 2-3; SpaceX Comments at 2.

<sup>13</sup> See 47 CFR § 54.502(e).

<sup>14</sup> See 47 CFR § 1.3. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*). In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. *Id.*

<sup>15</sup> *Northeast Cellular*, 897 F.2d at 1166 (stating that the Commission may waive a rule when strict compliance does not serve the public interest).

<sup>16</sup> See, e.g., *Modernizing the E-Rate Program for Schools and Libraries*, 34 FCC Rcd at 11219, 11242-43, para. 62 (2019) (*Category Two Report and Order*) (finding good cause to waive the 60-day rule for opening the filing window after issuance of the eligible services list to allow USAC and applicants with sufficient time to submit and process funding applications for funding year 2020); *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket 13-184, Order, 35 FCC Rcd 13793, 13794, para. 4 (WCB 2020) (same); *Modernizing the E-Rate*

(continued...)

6. Next, having considered the record, we adopt the eligible services list for funding year 2023, attached as Appendix B to this Order. In doing so, we make one clarification to the eligible services list in response to a request by Verizon. We revise the Category One list to clarify to applicants that fixed wireless service is eligible for Category One support, and further clarify that fixed wireless routers are eligible for Category One support.<sup>17</sup> We also received a request from Extreme Networks to clarify that its specific software is eligible for E-Rate support; while we decline to add specific software products to the eligible services list, we note that such products may be eligible.<sup>18</sup>

7. We decline to make any additional changes to the funding year 2023 eligible services list at this time. We remind applicants that the eligible services list process “is limited to determining what services are eligible under the Commission’s current rules and is generally not intended to be a vehicle for changing any eligibility rules.”<sup>19</sup> Accordingly, we decline to address comments and reply comments requesting that we include advanced or next-generation firewall or other network security services to the eligible services list,<sup>20</sup> due to the complexity of these issues and the limited scope of this proceeding.<sup>21</sup> While declining to address these comments and reply comments as part of this ESL proceeding for these reasons, we note that the Bureau is seeking further comment regarding the eligibility of additional network security services, including advanced or next-generation firewalls and services.<sup>22</sup> We further decline to address comments and reply comments regarding adding Wi-Fi services to school buses to the eligible services list.<sup>23</sup> As we noted in the *Funding Year 2023 Eligible Services List Public Notice*, a draft Declaratory Ruling finding that the provision of Wi-Fi on school buses serves an educational purpose and is eligible for E-Rate support was circulated on May 11, 2022.<sup>24</sup> If adopted, the Bureau noted that it

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\_\_\_\_\_ *Program for Schools and Libraries*, WC Docket 13-184, Order, 2021 WL 6063032, \*2, para. 4 (WCB Dec. 17, 2021) (same).

<sup>17</sup> See Verizon Comments at 1-2 (requesting clarification regarding the eligibility of fixed wireless services and routers). We also clarify that microwave service is eligible for category two support, and that we inadvertently omitted microwave service from the proposed Funding Year 2023 ESL that was included as an Appendix in the *Funding Year 2023 Eligible Services List Public Notice*, which was released on August 22, 2022.

<sup>18</sup> See Extreme Networks Comments at 1-2. We find that software providing operation, management, and monitoring functions utilized to optimize deployment of eligible equipment may be eligible if competitively bid, requested as managed internal broadband services, and otherwise compliant with our rules.

<sup>19</sup> See, e.g., *Comment Sought on Draft Eligible Services List for Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Public Notice, 24 FCC Rcd 7422, 7423 (WCB 2009); *Wireline Competition Bureau Seeks Comment on Draft Eligible Services List for Schools and Libraries Universal Service Program*, CC Docket No. 02-6, Public Notice, 26 FCC Rcd 8714, 8718 (WCB 2011); *In the Matter of Schools and Libraries Universal Service Support Mechanism, A National Broadband Plan for our Future*, CC Docket No. 02-6, Order, 28 FCC Rcd 14583, 14588, para. 13 & n.37 (WCB 2013).

<sup>20</sup> See, e.g., ADS Reply at 1-3; ALA Comments at 1-2; Aruba Reply at 1-2; CGCS Comments at 1-3; CoSN Reply at 2-3; Crown Castle Fiber Reply at 1-5; ENA Services Reply at 3; Fortinet Comments at 5-10; SETDA Reply at 1-2; Val Verde Unified School District Comments at 1-2.

<sup>21</sup> See, e.g., *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-84, Order, 30 FCC Rcd 9923, 9931, para. 23 (WCB 2015) (declining to address requested changes to the eligible services list due to the complexity of the issues and the scope of the proceeding); *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184, Order, 31 FCC Rcd 9767, 9769, para. 8 (WCB 2016) (same).

<sup>22</sup> See *Wireline Competition Bureau Seeks Comment on Requests to Allow the Use of E-Rate Funds for Advanced or Next-Generation Firewalls and Other Network Security Services*, Public Notice, DA 22-1315 (WCB Dec. 14, 2022).

<sup>23</sup> See *supra* note 12

<sup>24</sup> *Funding Year 2023 Eligible Services List Public Notice* at 1, n.2.

would separately seek comment on the issue of adding Wi-Fi services to school buses,<sup>25</sup> and thus, we will not consider it as part of this proceeding.

### III. ORDERING CLAUSES

8. ACCORDINGLY, IT IS ORDERED, that pursuant to the authority contained in sections 1 through 4, 254, 303(r), and 403 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-154, 254, 303(r), and 403, sections 0.91 and 54.502 of the Commission's rules, 47 CFR §§ 0.91 and 54.502, this Order IS ADOPTED.

9. IT IS FURTHER ORDERED, that pursuant to the authority contained in sections 1 through 4 and 254 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151-154 and 254, and pursuant to the authority in section 1.3 of the Commission's rules, 47 CFR § 1.3, that section 54.502(e), 47 CFR § 54.502(e) IS WAIVED, and such waiver SHALL BECOME EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Trent B. Harkrader  
Chief  
Wireline Competition Bureau

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<sup>25</sup> *Id.*

**APPENDIX A****List of Commenters****Comments and Reply Comments in Response to the  
*Funding Year 2023 Eligible Services List Public Notice*****WC Docket No. 13-184****Commenters**

1. American Library Association (ALA)
2. Council of the Great City Schools (CGCS)
3. E-Rate Provider Services, LLC
4. Fortinet, Inc.
5. Extreme Networks, Inc.
6. Los Angeles Unified School District, et al. (LA USD)
7. Space Exploration Technologies Corporation (SpaceX)
8. Val Verde Unified School District (Val Verde)
9. Verizon Communications, Inc. (Verizon)

**Reply Commenters**

1. AASA, The School Superintendents Association, et al. (AASA)
2. ADS Advanced Data Services, Inc.
3. Aruba, a Hewlett Packard Enterprise company (Aruba)
4. Consortium for School Networking (CoSN)
5. Crown Castle Fiber, LLC
6. ENA Services, LLC d/b/a ENA by Zayo (ENA Services)
7. Los Angeles Area Chamber of Commerce
8. State Educational Technology Directors Association (SETDA)

**APPENDIX B****Eligible Services List for Funding Year 2023  
Schools and Libraries Universal Service Support Mechanism****WC Docket No. 13-184**

The Federal Communications Commission's (FCC) rules provide that all services that are eligible to receive discounts under the Schools and Libraries Universal Service Support Mechanism (otherwise known as the E-Rate program or E-Rate) are listed in this Eligible Services List (ESL). 47 CFR § 54.502(a). The E-Rate program is administered by the Universal Service Administrative Company (USAC). 47 CFR § 54.5. Eligible schools and libraries may seek E-Rate support for eligible Category One telecommunications services, telecommunications, and Internet access, and Category Two internal connections, basic maintenance, and managed internal broadband services as identified herein. 47 CFR §§ 54.500 *et seq.*

Additional guidance from USAC about the E-Rate application process and about eligible services, including a glossary of terms, is available at USAC's website at <https://www.usac.org/e-rate/applicantprocess/before-you-begin/eligible-services-list/>. The documents on USAC's website are not incorporated by reference into the ESL and do not bind the Commission. Thus, they will not be used to determine whether a service or product is eligible. Applicants and service providers may refer to those documents, but they should do so only for informal guidance. This ESL applies to funding requests for Funding Year (FY) 2023.

**Category One**

The first category of supported services, Category One, includes the services needed to support broadband connectivity to schools and libraries. Eligible Category One services are listed in the entries for data transmission and/or Internet access. This category consists of the services that provide broadband to eligible locations including data links that connect multiple points, services used to connect eligible locations to the Internet, and services that provide basic conduit access to the Internet. With the exception of leased dark fiber and self-provisioned broadband networks, maintenance and technical support appropriate to maintain reliable operation are only eligible for support when provided as a component of these services.

**Data Transmission and/or Internet Access**

Data transmission and/or Internet access services are eligible in Category One. These services include:

- Asynchronous Transfer Mode (ATM)
- Broadband over Power Lines
- Cable Modem
- Digital Subscriber Line (DSL)
- DS-1 (T-1), DS-3 (T-3), and Fractional T-1 or T-3
- Ethernet
- Integrated Services Digital Network (ISDN)

*Note:* Dedicated voice channels on an ISDN circuit are no longer eligible.

- Leased Lit Fiber
- Leased Dark Fiber (including dark fiber indefeasible rights of use (IRUs) for a set term)
- Self-Provisioned Broadband Networks (applicant owned and operated networks)
- Frame Relay
- Multi-Protocol Label Switching (MPLS)
- OC-1, OC-3, OC-12, OC-n
- Satellite
- Switched Multimegabit Data Service
- Telephone dial-up
- Wireless (e.g., fixed wireless, microwave)

*Notes:*

- (1) Eligible costs include monthly charges, special construction, installation and activation charges, modulating electronics and other equipment necessary to make a Category One wired or wireless broadband service functional (“Network Equipment”), and maintenance and operation charges. Network Equipment and maintenance and operation costs for existing networks are eligible. All equipment and services, including maintenance and operation, must be competitively bid.
- (2) Applicants that seek bids for leased dark fiber must also seek bids for leased lit fiber service and fully consider all responsive bids. Similarly, applicants that seek bids for self-provisioned broadband networks must also seek bids for the needed connectivity via services provided over third-party networks, and fully consider all responsive bids.
- (3) Applicants may seek special construction funding for the upfront, non-recurring costs for the deployment of new or upgraded facilities. The eligible components of special construction are construction of network facilities, design and engineering, and project management.
- (4) Staff salaries and labor costs for personnel of the applicant or underlying beneficiary are not E-Rate eligible.

## **Category Two**

The second category of equipment and services eligible for E-Rate support, Category Two, includes the internal connections needed for broadband connectivity within schools and libraries. Support is limited to the internal connections necessary to bring broadband into, and provide it throughout, schools and libraries. These are broadband connections used for educational purposes within, between, or among instructional buildings that comprise a school campus (as defined below in the section titled “Eligibility Explanations for Certain Category One and Category Two Services”) or library branch, and basic maintenance of these connections, as well as services that manage and operate owned or leased broadband internal connections (e.g., managed internal broadband services or managed Wi-Fi). Category Two support is subject to district- or library system-wide budgets as set forth in 47 CFR § 54.502. The eligible components and services in Category Two are.

### **Eligible Broadband Internal Connections**

- Antennas, connectors, and related components used for internal broadband connections
- Cabling
- Caching
- Firewall services and firewall components separate from basic firewall protection provided as a standard component of a vendor’s Internet access service
- Racks
- Routers
- Switches
- Uninterruptible Power Supply (UPS)/Battery Backup
- Access points used in a local area network (LAN) or wireless local area network (WLAN) environment (such as wireless access points)
- Wireless controller systems
- Software supporting the components on this list used to distribute high-speed broadband throughout school buildings and libraries (applicants should request software in the same category as the associated service being obtained or installed)

#### *Notes:*

- (1) Functionalities listed above that can be virtualized in the cloud, and equipment that combines eligible functionalities, like routing and switching, are also eligible.
- (2) A manufacturer’s multi-year warranty for a period up to three years that is provided as an integral part of an eligible component, without a separately identifiable cost, may be included in the cost of the component.
- (3) Caching is defined as a method that stores recently accessed information. Caching stores information locally so that the information is accessible more quickly than if transmitted across a network from a distance. A caching service or equipment that provides caching, including servers necessary for the provision of caching, is eligible for funding.
- (4) Applicants may request both equipment and the software necessary to use the equipment on the FCC Form 470, or request just the equipment on the FCC Form 470, and still receive support for both the equipment and the software necessary to use the equipment (e.g., right-to-use software or client access licenses) by requesting the equipment and software either together or separately on the FCC Form 471. However, software upgrades and patches, including bug fixes and security patches, are considered basic maintenance of internal connections, and as such, applicants should seek bids for basic maintenance of internal connections if they intend to request funding for these services.



**Eligible Managed Internal Broadband Services**

- Services provided by a third party for the operation, management, and monitoring of eligible broadband internal connections are eligible managed internal broadband services (e.g., managed Wi-Fi).
- E-Rate support is limited to eligible expenses or portions of expenses that directly support and are necessary for the broadband connectivity within schools and libraries. Eligible expenses include the management and operation of the LAN/WLAN, including installation, activation, and initial configuration of eligible components and on-site training on the use of eligible equipment.
- In some eligible managed internal broadband services models, the third-party manager owns and installs the equipment and school and library applicants lease the equipment as part of the managed services contract. In other cases, the school or library may own the equipment, but have a third party manage the equipment for it.

**Basic Maintenance of Eligible Broadband Internal Connections**

E-Rate support is available for basic maintenance and technical support appropriate to maintain reliable operation when provided for eligible broadband internal connections.

The following basic maintenance services are eligible:

- Repair and upkeep of eligible hardware
- Wire and cable maintenance
- Configuration changes
- Basic technical support including online and telephone-based technical support
- Software upgrades and patches including bug fixes and security patches

**Eligibility Limitations for Category Two Services**

**Eligibility limitations for managed internal broadband services** – The equipment eligible for support as part of a managed internal broadband service may include only equipment listed above as broadband internal connections. Upfront charges that are part of a managed service contract are eligible for E-Rate support except to the extent that the upfront charges are for any ineligible internal connections (e.g., servers other than those that are necessary to provide caching), which, if included in the contract, must be cost allocated out of any funding request.

**Eligibility limitations for basic maintenance** – Basic maintenance is eligible for support only if it is a component of a maintenance agreement or contract for eligible broadband internal connections. The agreement or contract must specifically identify the eligible internal connections covered, including product name, model number, and location. Support for basic maintenance will be paid for the actual work performed under the agreement or contract. Support for bug fixes, security patches, and technical support is not subject to this limitation.

Basic maintenance does not include:

- Services that maintain ineligible equipment
- Upfront estimates that cover the full cost of every piece of eligible equipment
- Services that enhance the utility of equipment beyond the transport of information, or diagnostic services in excess of those necessary to maintain the equipment's ability to transport information
- Network management services, including 24-hour network monitoring
- On-site technical support (i.e., contractor duty station at the applicant site), unless applicants present sufficient evidence of cost-effectiveness
- Unbundled warranties

**Eligibility Explanations for Certain Category One and Category Two Services**

**Note:** National Security Supply Chain Restrictions: Equipment or services produced or provided by a company that the FCC has designated as a national security threat to the integrity of communications networks or the communications supply chain are not eligible for E-Rate support. 47 CFR § 54.9(a). In addition, participants are prohibited from using E-Rate support to purchase, rent, lease, or otherwise obtain any covered communications equipment or service, or maintain any covered communications equipment or service previously purchased, rented, leased, or otherwise obtained. 47 CFR § 54.10. A list of covered communications equipment and services can be found on the FCC’s website at <https://www.fcc.gov/supplychain/coveredlist> and will be updated to reflect any future determinations.

**Internet access/ISP service** – Eligible Internet access services may include features such as basic firewall protection, domain name service, and dynamic host configuration when these features are provided as a standard component of a vendor’s Internet access service. Firewall protection that is provided by a vendor other than the Internet access service provider or priced out separately will be considered a Category Two internal connections component. Examples of items that are ineligible components of Internet access services include applications, content, e-mail, and end-user devices and equipment such as computers, laptops, and tablets.

**Wireless services and wireless Internet access** – As clarified in the *2014 Second E-Rate Order* (FCC 14-189), data plans and air cards for mobile devices are eligible only in instances when the school or library seeking support demonstrates that the individual data plans are the most cost-effective option for providing internal broadband access for mobile devices at schools and libraries. Applicants should compare the cost of data plans or air cards for mobile devices to the total cost of all components necessary to deliver connectivity to the end user device, including the cost of data transmission and/or Internet access to the school or library. Seeking support for data plans or air cards for mobile devices for use in a school or library with an existing broadband connection and WLAN implicates the E-Rate program’s prohibition on requests for duplicative services.

Off-campus use even if used for an educational purpose is ineligible for support and must be cost allocated out of any funding request.

Managed internal broadband services, such as managed Wi-Fi, are eligible only for Category Two support.

**Connections between buildings of a single school** – The classification of connections between multiple buildings of a single school is determined by whether the buildings are located on the same campus. A “campus” is defined as the geographically contiguous grounds where the instructional buildings of a single eligible school are located. A single school may have multiple campuses if it has instructional buildings located on grounds that are not geographically contiguous. Different schools located on the same grounds do not comprise a single campus. The portion of the grounds occupied by the instructional buildings for each school is a campus for that school.

- Connections between buildings on different campuses of a single school are considered to be Category One data transmission services.
- Connections between different schools with campuses located on the same property (e.g., an elementary school and middle school located on the same property) are considered to be Category One data transmission services, unless they share the same building.

Connections between buildings of a single school on the same campus are considered to be Category Two internal connections.

**Network equipment with mixed eligibility** – On-premises equipment that connects to a Category Two eligible LAN is eligible for Category One support if it is necessary to make a Category One broadband service functional. If the price for components that enable the LAN can be isolated from the price of the components that enable the Category One service, those costs should be cost-allocated out of the Category One funding request.

**Miscellaneous**

As described below, various miscellaneous services associated with Category One or Category Two are eligible for support. Applicants should request eligible miscellaneous services in the same category as the associated service being obtained or installed.

**Fees**

Fees and charges that are a necessary component of an eligible product or service are eligible, including:

- Change fees
- Contingency fees are eligible if they are reasonable and a regular business practice of the service provider. Contingency fees will be reimbursed only if the work is performed.
- Freight assurance fees
- Lease or rental fees on eligible equipment
- Per diem and/or travel time costs are eligible only if a contract with a vendor for the eligible product or services specifically provides for these costs.
- Shipping charges
- Taxes, surcharges, and other similar, reasonable charges incurred in obtaining an eligible product or service are eligible. These types of charges include customer charges for universal service fees, but do not include additional charges for universal service administration.

**Installation, Activation, and Initial Configuration**

Installation, activation, and initial configuration of eligible components are eligible. These services may include:

- Design and engineering costs if these services are provided as an integral component of the installation of the relevant services
- Project management costs if these services are provided as an integral component of the installation of the relevant services
- On-site training is eligible as a part of installation services but only if it is basic instruction on the use of eligible equipment, directly associated with equipment installation, and is part of the contract or agreement for the equipment. Training must occur coincidentally or within a reasonable time after installation.